

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DARYOUSH TAHA	:	CIVIL ACTION
Plaintiff	:	
	:	12-06867
v.	:	
	:	
BENSALEM TOWNSHIP et al.	:	
Defendants	:	

PLAINTIFF DARYOUSH TAHA’S MOTION TO SUBSTITUTE CLASS COUNSEL

Plaintiff, Daryoush Taha (“Plaintiff”) files this Motion to Substitute Class Counsel. In support of this motion, Plaintiff states as follows:

1. Jonathan Shub of Kohn, Swift and Graf, P.C.; Allan E. Denenberg of Abramson & Denenberg; and Scott A. George of Seeger Weiss LLP are counsel of record for Plaintiff.
2. At the time this action was filed, Mr. Shub was a partner at Seeger Weiss LLP. On April 28, 2016, Mr. Shub filed a Notice of Change of Address with this court (Dkt. No. 135).
3. Mr. Shub continued to diligently prosecute this case as a member of Kohn, Swift & Graf, P.C., including drafting the Motion for Class Certification papers and participating in oral argument on said Motion.
4. Plaintiff seeks the withdraw of Mr. George of Seeger Weiss LLP as counsel of record for Plaintiff and the class.
5. Pursuant to Federal Rule of Civil Procedure 23(g)(1)(E), Plaintiff seeks to substitute Mr. Shub of Kohn, Swift & Graf, P.C. as class counsel and withdraw Seeger Weiss LLP as class counsel. Mr. Shub would serve along with Abramson & Denenberg, the firm previously appointed Class Counsel in this Court’s decision of May 4, 2016 (Dkt. No. 158).

6. Defendants have authorized Plaintiff to represent that they do not oppose this motion. A Certificate of Uncontested Motion is attached hereto.

7. This motion is not made for purposes of delay and does not prejudice Defendants. As class counsel, Kohn, Swift & Graf will continue to fairly and adequately represent the interests of the class.

8. Mr. Shub is a member in good standing of the State Bar of Pennsylvania (PA Bar No. 53965) and is admitted to practice in the Eastern District of Pennsylvania.

9. This motion is supported by the accompanying Declaration of Jonathan Shub, setting forth Kohn, Swift & Graf's expertise and experience in prosecuting consumer class actions and other information relevant to the factors listed in Rule 23(g), as well as any other written or oral submissions this Court may request.

Wherefore, based on the foregoing, Plaintiff respectfully requests that this Motion to Substitute Class Counsel be granted.

Dated: May 10, 2016

Respectfully Submitted,

/s/ Jonathan Shub
Jonathan Shub
Kohn, Swift & Graf, P.C.
One South Broad Street, Suite 2100
Philadelphia, PA 19107
Ph: 215-238-1700
jshub@koh Swift.com

Attorneys for Plaintiff and the Class

CERTIFICATE OF SERVICE

I certify that copies of the foregoing documents were served by ECF on all counsel of record on May 10, 2016.

Dated: May 10, 2016

By: /s/ Jonathan Shub
Jonathan Shub

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DARYOUSH TAHA	:	CIVIL ACTION
Plaintiff	:	
	:	
	:	12-06867
v.	:	
	:	
BENSALEM TOWNSHIP et al.	:	
Defendants	:	

CERTIFICATE OF UNCONTESTED MOTION

Pursuant to Local Rule 7.1(b), the undersigned certifies that the attached Plaintiff's
Unopposed Motion To Substitute Counsel is uncontested.

Dated: May 10, 2016

Respectfully submitted,

/s/ Jonathan Shub
Jonathan Shub, Esquire
KOHN, SWIFT & GRAF, P.C.
Identification No: 53965
One South Broad Street
Suite 2100
Philadelphia, PA 19107
Phone: (215) 564-2300
Fax: (215) 851-8029
jshub@kohswift.com

Attorneys for Plaintiff and the Class